



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION
-----X

Docket No.: 21 MC 100 (AKH)

NOTICE OF MOTION

THIS DOCUMENT APPLIES TO ALL
WORLD TRADE CENTER DISASTER SITE
LITIGATION
-----X

PLEASE TAKE NOTICE THAT upon the Declaration of Brian D. Crosby dated January 31, 2011 and the exhibits annexed thereto, this Court's Order of January 5, 2011, Plaintiffs' Liaison Counsel will ask this Court to Order:

1. That the plaintiffs' cases on the attached Exhibit A are hereby reinstated;
2. That Plaintiffs' cases listed on the attached Exhibit E be listed on a Voluntary Dismissal Order; and
3. Such other and additional relief as this Court deems just and proper.

Dated: New York, New York
January 31, 2011

Respectfully submitted,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Plaintiffs' Co-Liaison Counsel

A handwritten signature in black ink, appearing to be "B. Crosby".

Brian D. Crosby (BC-9543)

350 5th Avenue, Suite 7413
New York, New York 10118
(212) 267-3700

To:

Without objection, the motion is granted. The Plaintiffs listed on the attached schedule are deemed to have voluntarily dismissed their cases, consistent with the terms of my order of December 30, 2010, see Doc. No. 2267 and subject to its terms. The Clerk shall terminate the motion (Doc. No. 2324).
SO ORDERED.
A handwritten signature in black ink, appearing to be "A. C. [unclear]".
February 25, 2011

James E. Tyrrell Jr., Esq.
Patton Boggs, LLP
Defendants' Liaison Counsel and
Counsel for Defendant City of New York
One Riverfront Plaza, 6th floor
Newark, New Jersey 07102

Beth D. Jacob, Esq.
Schiff Hardin, LLP
Defendants' Liaison Counsel
900 Third Avenue, 23rd Floor
New York, New York 10022

Margaret Warner, Esq.
McDermott Will & Emery, LLP
600 13th Street, N.W.
Washington, D.C. 20005-3096
Mwarner@mwe.com

Andrew J. Carboy
Sullivan Papain, Block, McGrath & Cannavo, P.C.
120 Broadway
New York, New York 10271
acarboy@triallaw1.com

EXHIBIT A

- 1) Richard Prager, 07CV05041;
- 2) John Defano, 07CV04916;
- 3) Rudolph Geiger, 05CV00406;
- 4) Samuel Gilford, 06CV09785;
- 5) William Gutierrez, 08CV01384;
- 6) Thaddeus Hall, 07CV10879;
- 7) Daniel Moynihan, 07CV05021;
- 8) Mimi Netrosio, 06cv11774;
- 9) Grant Sneddon, 07CV09189; and
- 10) Michael Vaughan, 06cv15110.

EXHIBIT E

- 1) Arthur Zipp, 09cv03718; and
- 2) John Giovanetti, 09CV03362.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION

-----X Docket No.: 21 MC 100 (AKH)

THIS DOCUMENT APPLIES TO ALL
WORLD TRADE CENTER DISASTER SITE
LITIGATION

-----X

NOTICE OF MOTION

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Attorneys for : Plaintiffs
350 5th Avenue, Ste. 7413
New York, New York 10118
(212) 267-3700

The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 that I have read the within papers and that to the best of my knowledge and belief they are factually correct and meritorious.



Attorney name: Brian D. Crosby (BC9543)

Service of a copy of the within
Dated, _____

is hereby admitted.

ATTORNEY(S) FOR

PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the
office of the clerk of the within named court on _____ 200__.

☐ NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy, will be
presented for settlement to the HON. _____ one of the judges of the
within named Court, at _____ on _____ 200__ at _____ O'clock ____ M.

Dated, _____

Yours, etc.

WORBY GRONER EDELMAN & NAPOLI BERN LLP